



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D. C. 20460

E.13.115 A-2

OFFICE OF ENFORCEMENT

Monsanto Industrial Chemicals Co.,  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63166

Gentlemen:

Recent governmental sampling data indicate the presence of Polychlorinated Biphenyls (PCBs) and comparable chemical substances in the air, in water bodies, and in fish in several areas of the country. In order to determine the nature and extent of the possible adverse effects resulting from the presence of PCB compounds in the environment, the Environmental Protection Agency (EPA), in cooperation with other federal and State agencies, is attempting to determine the sources and amounts of PCBs entering the environment. It is important that this effort be carried out without delay.

It is our understanding that your company handles PCB compounds or mixtures or comparable chemical substances in its operations. I am therefore requesting, pursuant to the authority provided by Section 308 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. 1318, and Section 114 of the Clean Air Act, as amended, 42 U.S.C. 1857c-9, that your company furnish EPA with information pertaining to your use and handling of PCBs and comparable chemical substances. In addition to a general description, which should include information as to sources, quantities, uses, and ultimate disposition, you should respond in detail to the enclosed questions. If any question is not applicable to your company or operations, please so indicate by responding "not applicable."

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. Should you so request, however, any information (other than effluent or emission data) which the Administrator of this Agency determines to constitute methods or processes entitled to protection as trade secrets will be maintained as confidential, pursuant to procedures specified in 40 CFR Part 2.

This letter was sent out undated. It was mailed on 10-23-75

Date - 10/17/75

AKHQ 0001352



10583476

Within 14 days of receipt of this letter, your company must provide all information concerning your current status and activities and covering the twelve month period immediately preceding receipt of this letter.

Within 30 days following receipt of this letter, your company must provide all information for all of the prior years indicated.

The information required herein should be sent directly to the address indicated below. If you have any questions you may call the person indicated below or Mr. Blake A. Biles of our office at (202) 755-8731.

We appreciate your prompt cooperation in this matter.

Sincerely yours,

Stanley W. Legro  
Assistant Administrator  
for Enforcement

Enclosure

Regional Contact:  
Mr. Earl J. Stephenson  
Director, Enforcement Division  
Environmental Protection Agency  
1735 Baltimore  
Kansas City, Missouri 64108  
Telephone: (816) 374-2576

# Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63186  
Phone: (314) 694-1000

November 10, 1975

Mr. Blake Biles  
Office of Enforcement  
United States Environmental  
Protection Agency  
Waterside Mall  
401 M Street, S. W.  
Washington, D. C. 20460

Dear Mr. Biles:

As discussed Friday during our telephone conversation, I am finding the mechanics of assembling the information for responding to the questionnaire attached to Mr. Stanley W. Legro's letter of October 17 to be very time consuming. As you know I was not able to meet the 14-day requirement for supplying recent information.

At your request I have attempted to predict the dates when I will be able to forward meaningful responsive information. The best estimate I can reach at this time is that I may be able to supply the requested information by December 15. It is my personal belief that if the information is supplied in one report, it would give a more complete description of the available PCB - PCT information.

One of the principal reasons for the delay is that polychlorinated terphenyl (PCT) information is requested. Since Monsanto terminated the manufacture and sale of these materials in 1972 and since no environmental effects have been reported, I suggest you may consider deleting the PCT request at this time.

AKHQ 0001354

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Mr. Blake Biles

Page 2

November 10, 1975

As you suggested, it is possible that some of the available PCB information could be forwarded before the final report is submitted. Since much of the information I have reviewed to date consists of many interrelated parts, I would be concerned that the submission of partial information may lead to misunderstandings, or more likely, create the need for time consuming explanations which may defeat the purpose and still prolong the completion of the report.

Your favorable consideration of a time extension would be sincerely appreciated.

Sincerely,

*W B Papageorge*  
W. B. Papageorge  
Manager, Product Acceptability  
Process Chemicals Division

WBP:pd

cc: Mr. Mike Sanderson  
Enforcement Division  
Environmental Protection Agency  
1735 Baltimore  
Kansas City, Missouri 64108

AKHQ 0001355

80  
Monsanto



MONSANTO INDUSTRIAL CHEMICALS CO.  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63166  
Phone: (314) 694-1000

December 11, 1975

Mr. Earl J. Stephenson  
Director, Enforcement Division  
Environmental Protection Agency  
1735 Baltimore  
Kansas City, Missouri 64108

Dear Mr. Stephenson:

Attached is a response to the questionnaire which accompanied Mr. Stanley Legro's letter dated October 17, 1975.

To the best of my knowledge and belief, the information contained in this response represents the best information available to Monsanto.

If I can be of further assistance, please let me know.

Sincerely,

W. B. Papageorge  
Manager, Product Acceptability  
Process Chemicals Division

ajt

Attachment

CC: Mr. Stanley W. Legro  
US Environmental Protection Agency  
401 "M" Street, SW  
Washington, D.C. 20460

POLYCHLORINATED BIPHENYL (PCB) COMPOUNDS OR MIXTURES

In this response the phrase "PCB compound or mixture" includes those materials listed under Base Products in Exhibit A.

1. (a) Monsanto Industrial Chemicals Company does not import PCB compounds or mixtures. Amounts produced for 1971, 1972, 1973, 1974 and the first three quarters of 1975 are included in Exhibit C.

- (b) Production facilities:

For 1971 and 1972

Monsanto Company  
Box 249  
Anniston, Alabama 36201

For 1971 to present

Monsanto Company  
Route 3  
Sauget, Illinois 62201

The amounts produced at the Anniston, Alabama plant are shown on Exhibit D. The Sauget, Illinois unit produced the amounts shown on Exhibit E. Wholesale and retail outlets are not used.

- (c) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The PCB compounds or mixtures from the Anniston, Alabama facility are listed in Exhibit D. The remaining were shipped from the Sauget, Illinois facility.
2. (a) See Exhibit A - pages 2, 3 and 4 and Exhibit B.
- (b) See Exhibit A - pages 2, 3 and 4.
  - (c) The PCB compounds or mixtures used were produced by Monsanto. See 1(b).
  - (d) Production facilities are those shown under 1(b) and for 1971 and 1972 also included Monsanto Company, 1700 South Second Street, St. Louis, Missouri 63177. Products distributed through Monsanto's Anniston, Alabama unit are shown on Exhibit D. All Pyral products were distributed through the St. Louis, Missouri facility. Remainder of products distributed through the Sauget, Illinois unit. Amounts distributed are shown on the exhibits listed in 2c below.

- (e) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The products obtained from the Anniston, Alabama facility are listed in Exhibit D. The Pydraul products originated at the St. Louis, Missouri unit. The remaining were shipped from the Sauget, Illinois facility. We do not manufacture consumer products containing PCB compounds or mixtures.
- 3. (a) During 1971 and 1972 PCB compounds or mixtures were used as heat transfer fluids, hydraulic fluids and in transformers and capacitors. During the latter part of 1972, 1973, 1974 and 1975 PCB compounds or mixtures are only present in transformers and capacitors.
- (b) See Exhibit J. Amounts shown are for total Monsanto Company usage. No records are available to determine specific company facility. Inerteen was used in transformers. Pydrauls in air compressors. Therminols in industrial heat transfer systems.
- (c) The PCB products were all produced by Monsanto Company. The specific sources are shown on Exhibit J.
- 4. PCB compounds or mixtures are not reclaimed.
- 5. (a) During 1971 and 1972 solid waste material contaminated with PCB compounds or mixtures were buried in a secure landfill located within a fenced area on property owned by Monsanto Company at the Anniston, Alabama facility. Similar waste has also been buried in a secure landfill located on Monsanto Company property at the Sauget, Illinois facility during the period 1971 - 1975. Liquid wastes have been disposed by incineration for the period 1971 - 1975 in a high temperature unit located at the Sauget, Illinois facility. During 1975 solid waste was sent to Texas Ecologists, P. O. Box 307, Robstown, Texas 78380.
- (b) Waste materials containing PCB compounds or mixtures are received from many sources. The type of PCB compound or mixture in the waste is unknown. The concentration is also unknown. Solid waste is estimated as containing levels ranging from the ppm level to 50% by weight. Liquid waste is estimated to contain about 90% PCB compound or mixture.  
  
For amounts disposed see Exhibit K. Note the amounts shown refer to the total weight of waste. The actual PCB content is unknown.
- (c) See Exhibit K for total waste disposed. Concentration and type of PCB compound or mixture are unknown.

- (d) See Exhibit L. Total amounts of waste are shown. Concentration and type of PCB compound or mixture are unknown.
- (e) See 5a for name and location. See Exhibit K for amount disposed.
- 6. See Exhibit A. Monsanto Company does not import or reclaim PCB compounds or mixtures. Composition of disposed material is unknown but can range from ppm level to 100% by weight PCB.
- 7. (a) See Exhibit M for Sauget, Illinois facility waste effluent analyses. See Exhibit N for Anniston, Alabama facility water effluent analyses. For PCB emissions to the atmosphere at the Sauget, Illinois facility see Exhibit O. Analyses of air emissions were not made at the Anniston, Alabama facility.
- (b) See Exhibits M, N and O.
- (c) No information is available regarding the Anniston, Alabama facility. No information is available relating to PCB concentration in the air in the area of the Sauget, Illinois facility. Samples of the Mississippi River were taken in 1972. Results were as follows:

<u>*Sample Date</u>	<u>Location</u>	<u>mg/l PCB</u>
10/30/72	T.B. Bridge (downstream)	0.00012
12/13/72	Chain of Rocks Bridge (upstream)	0.0002 - 0.0004
12/12/72	N. of Ill. River (upstream)	0.0002 - 0.0004

\*Analytical blank value at 0.00005-0.00017

- 8. (a) PCB compounds or mixtures are liquids and are transported in bulk or in steel drums.
- (b) See Exhibit P for transporters of PCB compounds or mixtures from Monsanto facilities. Transporters of material returned for disposal can be any common carrier serving the St. Louis, Missouri area.



9. Monsanto Company is not aware of any occasion in which PCB compounds or mixtures were introduced into the environment which is not already known to representatives of the Environmental Protection Agency. Examples include the contamination of fish meal in North Carolina, the drainage of fluid from a transformer in transit in Tennessee and the leakage of fluid from a damaged transformer in the Duwamish waterway in Washington.
10. Monsanto Company is not aware of any health or environmental effects resulting from the introduction of PCB compounds or mixtures into the environment which has not been reported in the scientific and popular press and already known to representatives of the Environmental Protection Agency.
11. (a) Monsanto Company has received reports that about 1800 drums of PCB compounds or mixtures are being offered by a company located in the northeastern U.S. for sale for any application. This information was received from Mr. Robert Laham, Hub Fabric Leather Company, 7 Charlton Street, Everett, Massachusetts 02149. This has been discussed with a representative of the Environmental Protection Agency.

Recently Pyramid Chemical Sales Company, 1035 Virginia Drive, Fort Washington, Pennsylvania 19034 has advertised the availability for any application of Aroclor 1221, Aroclor 1232 and Arclor 5460. A representative of the Environmental Protection Agency has been informed.

81131-A DIRECT #2  
01/12/72

ORGANIC DIVISION SPECIALTY PRODUCTS  
PRODUCT/CUSTOMER SALES REPORT

FOR DEC 1971

PAGE

- IN THOUSANDS OF POUNDS AND DOLLARS -

NO.	NAME OF PRODUCT/CUSTOMER	POTENTIAL	LAST YEAR SALES	SALES CURR. YEAR	SALES CURR. YTD	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	CUSTOMER NO.
	TRANSFORM PYRANOL A1383B															00388A		1050-388
1227	ELESCO LORWOOD MASS			.675						.675								0025602
1866	ENERGY SYSTEMS PALO ALTO CA		7.43															1002825
1237	ERIE MANUFACTURING CO ERIE PA			.675									.675					0015711
1131	ERIE MFG CO ERIE PA		25.7	24.3	4.05	6.08							2.03	3.38	6.08	2.70		0016295
1257	ESPEY MFG ELECTR SARATOGA NY			.360										.360				0015855
<del>1274</del>	<del>FAIRCHILD HILLER HAGERSTOWN MD</del>			1.35						1.35								0011827
1237	FAIRCHILD HILLER HAGERSTOWN MD			.360						.360								0011831
1958	FALSTAFF BREWERY NEW ORLE LA		1.30															0015285
1932	FIRESTONE TIRE-KOR ALBANY GA																	1002821
<del>1932</del>	<del>FIRESTONE TIRE-KOR ALBANY GA</del>																	
	PARENT CUST. TOT-FIRESTONE TIRE		1.30	8.10						1.35					6.75			1002811
1978	FLA PWR - LIGHT MIAMI FL		1.44															1002873
1278	FLORIDA POWER & LIGHT MIAMI FL			1.44													1.44	0027325
<del>1978</del>	<del>FORD MOTOR CO CHGO ILL</del>			.720														0024824
1478	FORD MOTOR CO LOUISVILLE KY			.720														0024824
<del>1237</del>	<del>FORD MOTOR CO N J EDISON NJ</del>			.675														0011902
1237	FORD MOTOR CO N J EDISON NJ		.675															0011902
	PARENT CUST. TOT-FORD MOTOR DEAR		.675	14.3	.72				3.38	.12				3.38	4.73	2.03		0011823
1258	GATES ROW DENVER CO			.360												.360		1003651
<del>1978</del>	<del>GENERAL ELECTRIC FOUNDRY DEPTENNG OH</del>		2.70															1000520
1978	GENERAL ELECTRIC FOUNDRY DEPTENNG OH																	1000520
	PARENT CUST. TOT-GENERAL MOTORS		2.70	.360											.360			0015722
1866	GENL DYNAMICS SAN DIEGO CA		.675															1003092
1178	GENERAL ELE APPR LOUISVILLE KY		.720															002149
1932	GENL ELEC BIRMINGHAM AL			1.35												1.35		001200
1866	GEN ELEC GLENDALE AZ		4.05															100310
1866	G E CO LOS ANGELES ANAHEIM CA			3.38									3.38					001200
1866	GEN ELEC LOS ANGELES CA		8.91	2.91								1.08				1.35	.48	100315
1866	GEN ELEC OAKLAND CA		5.53	2.24					.80				1.44					100313
1866	GENERAL ELECTRIC PLEASANTON CA		1.08															001557
1866	GENERAL ELEC SUP RIVERSIDE CA		.130															002408
1866	GEN ELEC SAN DIEGO CA			.360							.360							002522
1866	GEN ELECTRIC SACRAMENTO CA		.675	1.35												1.35		100314
1866	GEN ELEC DENVER CO		1.35	2.03	2.03													100321
1237	GEN ELEC PLANTSVILLE CT			18.9	2.03			2.70	6.75				5.40					100309
1978	GEN ELEC HIALEAH FL		1.44															100311
1978	GEN ELEC JACKSONVILLE FL		2.03	5.63				4.28							1.35			100311

MICC SPECIALTY PRODUCTS  
PRODUCT/CUSTOMER SALES REPORT

FUR DEC 1972

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- IN THOUSANDS OF POUNDS AND DOLLARS -

	NAME OF PRODUCT/CUSTOMER	POTENTIAL	LAST YEAR SALES	THIS YEAR FOR CUM YEAR	SALES CUM YTD	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	CUSTOMER / MAILING CODE
	TRANSFORM PYRANOL A13830															00368A		1050-300-10
522	ELECTRIC SERVICE CO. TARRANT TX		6.75															00196576
523	ELECTRIC SERV CO ALCOA TENN		.675															0027784
524	ELECTRIC ENG WKS SAN LEANDRO CA	5.00	0.10	3.35														10025753
527	ELLENCO NORFOLK MASS		.675															00230621
529	ERIE MANUFACTURING CO ERIE PA		.675															00157112
530	ERIE MFG CO ERIE PA	20.0	24.3	20.0	2.70	2.70												00162557
537	ESPEY MFG ELECTR SAFATOGA KY		.360															00150652
538	FAIRCHILD MILLER FAGERSTROM MO		1.35															00116273
539	FALSTAFF BREWERY NEW ORLE LA		3.60															00118311
540	FARMER ENGINEERING CO. CANTON IL		8.10															10000109
541	FELTON POWER & LIGHT PLANT FL		1.44															00273052
542	FORD MOTOR CO CHICAGO ILL		3.36															10023079
543	FORD MOTOR CO LOUISVILLE KY		7.72															00245043
544	FORD MOTOR CO DETROIT MICH		4.85															00118007
545	FORD MOTOR CO STEEL DETROIT MI		5.40		2.03	2.03												100000159
546	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
547	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
548	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
549	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
550	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
551	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
552	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
553	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990
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600	FORD MOTOR CO FORD MOTOR LEAN		14.3		2.03	2.03												00118990

-Continued-

PCB WASTE RETURNS

<u>Vendor</u>	<u>1971</u>	<u>Pounds</u>
General Electric (Allerton, Pa.)		7,425
(Chicago, Ill.)		14,143
(Charlotte, N.C.)		5,135
(Corpus Christi, Texas)		2,016
(Erie, Pa.)		333
(Medford, Mass.)		3,354
(Morrison, Ill.)		1,916
(Petersboro, Ontario)		51,500
(Pittsfield, Mass.)		520
(Oakland, Cal)		6,500
Geigy Chem. Corp. (Cranston, R.I.)		1,794
General Motors (Swartz Creek, Mich.)		1,605
Glyco Chemicals, Inc. (Painesville, Ohio)		6,086
Great Lakes Steel (Ecorse, Mich.)		6,180
Hamilton Mfg. Co. (Richmond, Va.)		5,370
Hercules, Inc. (Terre Haute, Ind.)		1,924
Hevi-Duty Elect. (Goldsboro, N.C.)		29,988
Hexagon Labs, Inc. (Bronx, N.Y.)		7,200
High Energy, Inc. (Malverl, Pa.)		1,800
Iceland Food Terminal, Inc. (Camp Hill, Pa.)		1,840
International Paper Co. (Camden, Ark.)		1,185

-Continued-

PCB WASTE RETURNS

<u>Vendor</u>	<u>1973</u>	<u>Pounds</u>
Duriron Co. Dayton, Ohio		508
Eastman Kodak Rochester, N.Y.		3,500
E.I. DuPont Louisville, Ky.		907
Electric Power Board Chattanooga, Tenn.		6,280
Esprey Mfg. Saratoga Springs, N.Y.		6,048
Ethyl Corp. Baton Rouge, La.		3,865
Findett Service Co. St. Charles, Mo.		4,305
Firestone Rubber & Latex Akron, Ohio		1,600
Franklin Glue Columbus, Ohio		600
Florida Power & Light Miami, Fla.		3,200
Ford Motor Co. Cleveland, Ohio		3,857
Dearborn, Mich.		1,580
Mr. Clemens, Mich.		35,570
General Electric Anaheim, Calif.		4,500
Charleston, W. Va.		343
Chicago, Ill.		14,625
Cincinnati, Ohio		1,280
Columbus, Ohio		3,200
Corpus Christi, Texas		10,150
Coshocton, Ohio		25,550
Dallas, Texas		2,058
Denver, Colo.		7,885
Kansas City, Mo.		24,000
Milwaukee, Wis.		11,450
Memphis, Tenn.		5,431
Oakland, Calif.		2,150
Spokane, Wash.		7,800
St. Louis, Mo.		5,093